

THE LAW OFFICE OF JEFF CHABROWE

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December 18, 2019
via ECF

Hon. Magistrate Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: U.S. v. Iorhemba Asan Jr. et al.; 19-mag-10177 (UA)

Your Honor,

We represent Mr. Charles Ogozy in the above-referenced matter. We respectfully request that our client be allowed to travel to Detroit on December 21, 2019 and return on December 28, 2019. At this time, we also formally withdraw our request for the removal of Mr. Ogozy's ankle bracelet.

Mr. Ogozy has purchased train tickets to travel to be with family in Detroit for the holidays. *See Defendant's Exhibit A, Amtrak eTICKET*. His train to Detroit is scheduled to depart on December 21, 2019 a.m. and his train back to New York is scheduled to arrive in New York on December 29, 2019 at 4:30 p.m. *See Id.* We respectfully ask that Mr. Ogozy be allowed to make this trip.

Pretrial Services reports that Mr. Ogozy has been fully compliant with the conditions of his release. AUSA Sagar Ravi consents this request so long as Mr. Ogozy remains on the bracelet.

Thank you for your time and consideration.

Respectfully,

Jeffrey Chabrowe

Jeff Chabrowe, Esq.
Counsel for defendant Ogozy
cell 917-529-3921
email jeff@chabrowe.com

12/19/19
Application granted.
Before Mr. Ogozy travels to
Detroit, he must provide
the following to Pretrial Services
Officer Kelly Fernandez:
1) the address in Detroit where he
will reside;
2) the telephone number at the
address where he will reside; and
3) his travel itinerary.

SO ORDERED:

Kevin Nathaniel Fox

KEVIN NATHANIEL FOX, U.S.M.J.

Attn: Clerks Office
Southern District of New York

Enclosed, please find a filing for a defendant who has not yet been assigned a Magistrate Judge.

Thank you.

EXHIBIT A

**PRESENT THIS DOCUMENT FOR BOARDING**

RESERVATION NUMBER 6C75ED

RES# 6C75ED-17DEC19

NWK**DET****Round-Trip**

NEWARK PENN STA, NJ

DETROIT, MI

DECEMBER 21, 2019

Depart

| | | | | |
|---------------------|--|--|----------------------------|--|
| TRAIN 143 | NORTHEAST REGIONAL Dec 21, 2019 | NEWARK (PENN STATION) - WASHINGTON 1 Business Class Seat | DEPARTS 10:04 AM | ARRIVES (Sat Dec 21) 1:21 PM |
| TRAIN 29 | CAPITOL LIMITED Dec 21, 2019 | WASHINGTON - TOLEDO 1 Reserved Coach Seat | DEPARTS 4:05 PM | ARRIVES (Sun Dec 22) 5:08 AM |
| BUS 6049 | AMTRAK THRUWAY CONNECTING SERVICE Dec 22, 2019 Operated by TRINITY TRANSPORTATION | TOLEDO - DETROIT 1 Reserved Thruway Seat | DEPARTS 6:30 AM | ARRIVES (Sun Dec 22) 7:35 AM |

Return

| | | | | |
|--------------------|--|--|----------------------------|---|
| BUS 6048 | AMTRAK THRUWAY CONNECTING SERVICE Dec 28, 2019 Operated by TRINITY TRANSPORTATION | DETROIT - TOLEDO 1 Reserved Thruway Seat | DEPARTS 9:30 PM | ARRIVES (Sat Dec 28) 10:35 PM |
| TRAIN 30 | CAPITOL LIMITED Dec 28, 2019 | TOLEDO - PITTSBURGH (UNION STATION) 1 Reserved Coach Seat | DEPARTS 11:49 PM | ARRIVES (Sun Dec 29) 5:05 AM |
| TRAIN 42 | PENNSYLVANIAN Dec 29, 2019 | PITTSBURGH (UNION STATION) - NEWARK (PENN STATION) 1 Business Class Seat | DEPARTS 7:30 AM | ARRIVES (Sun Dec 29) 4:30 PM |

PASSENGERS (1)

OGOZY, CHARLES

ADULT

AMTRAK GUEST REWARDS

No member number provided. Join at Amtrak.com

Proper identification is required for all passengers. This document is valid for only passengers listed. See www.amtrak.com/ID for details.**IMPORTANT INFORMATION**

* For passenger safety the boarding gate at Washington Union Station will close two minutes prior to train departure time.

- ~~eTickets for Reserved~~ services are valid only for the specific train number, date and accommodation type booked.
- When should you arrive at the station? Check the recommended arrival times for your departure station at [Amtrak.com/stations](https://www.amtrak.com/stations). Allow additional time if you require ticketing/baggage services or boarding assistance, or if you are boarding at a Canadian station.
- Tickets are non-transferable. They are valid only for the personal use of the passenger(s) named on the ticket.
- For Amtrak travel information, or to make adjustments to your travel plans, please visit [Amtrak.com](https://www.amtrak.com), or call 1-800-USA-RAIL (1-800-872-7245).
- Your printed eTicket travel document shows the services you booked. If you change your booking but do not reprint the document, it will not reflect your current itinerary. You may obtain an updated copy of your eTicket at [Amtrak.com](https://www.amtrak.com). At some stations, a gate agent may need to view your eTicket prior to boarding (learn more at [Amtrak.com/boarding](https://www.amtrak.com/boarding)).
- Changes to your itinerary may affect your fare. Refund and exchange restrictions and penalties for failure to cancel unwanted travel may apply. For more information please visit [Amtrak.com/changes](https://www.amtrak.com/changes).
- Carry-on baggage is limited to 2 personal items, 14x11x7" / 25lbs per item, and 2 bags, 28x22x14" / 50lbs per bag, per passenger. You may be charged a baggage fee or denied boarding if your items exceed these limitations. See the baggage policy at [Amtrak.com/baggage](https://www.amtrak.com/baggage).
- Check the departure board or ask a uniformed Amtrak employee to find out where to board your train.
- **If You See Something Say Something! Contact Amtrak Police at 1-800-331-0008 or Text to AFD11 (27311).**

* * * Journal (Dec. 18. 2019 4:28PM) * * *

1)
2)

| < TX > | | Date | Time | Destination | Mode | TXtime | Page | Result | User Name | File No. |
|--------|--|----------|---------|-----------------|-------|--------|------|--------|-----------|----------|
| | | Dec. 10. | 3:00PM | 916023227209 | G3TSM | 3:11" | P. | 8 OK | | 3756 |
| | | Dec. 13. | 5:40PM | 916023227209 | G3TSM | 3:00" | P. | 8 OK | | 3794 |
| < RX > | | Date | Time | Sender | Mode | RXtime | Page | Result | User Name | File No. |
| | | Nov. 14. | 11:16AM | 212 481 8250 | G3RFS | 0:35" | P. | 2 OK | | 3308 |
| | | | 11:19AM | 212 481 8250 | G3RFS | 0:35" | P. | 2 OK | | 3308 |
| | | | 4:58PM | 718 625 6837 | G3RFS | 0:35" | P. | 2 OK | | 3308 |
| | | | 5:29PM | | G3RFS | 0:35" | P. | 1 OK | | 3308 |
| | | Nov. 15. | 2:50PM | | G3RFS | 0:35" | P. | 2 OK | | 3308 |
| | | Nov. 19. | 11:04AM | 212 571 0392 | G3RFS | 0:24" | P. | 2 OK | | 3308 |
| | | Nov. 20. | 7:17AM | | G3RFS | 1:02" | P. | 1 OK | | 3308 |
| | | | 11:56PM | Ny Main Fax | G3RFS | 0:40" | P. | 4 OK | | 3308 |
| | | Nov. 21. | 9:38AM | | G3RFS | 0:25" | P. | 2 OK | | 3308 |
| | | Nov. 22. | 12:36PM | 845 369 7383 | G3RFS | 0:52" | P. | 3 OK | | 3308 |
| | | | 3:43PM | 718 618 0140 | G3RFS | 0:37" | P. | 2 OK | | 3308 |
| | | Nov. 25. | 10:56AM | 212 571 0392 | G3RFS | 0:36" | P. | 2 OK | | 3308 |
| | | | 11:00AM | | G3RFS | 0:29" | P. | 2 OK | | 3308 |
| | | | 1:37PM | | G3RFS | 0:18" | P. | 1 OK | | 3308 |
| | | | 7:24PM | | G3RFS | 0:39" | P. | 1 OK | | 3308 |
| | | Nov. 26. | 10:42AM | Brian Almodovar | G3RFS | 0:53" | P. | 4 OK | | 3308 |
| | | | 10:52AM | Brian Almodovar | G3RFS | 0:41" | P. | 4 OK | | 3308 |
| | | | 10:56AM | 2129423900 | G3RFS | 0:22" | P. | 2 OK | | 3308 |
| | | Nov. 27. | 11:48AM | Brian Almodovar | G3RFS | 0:46" | P. | 4 OK | | 3308 |
| | | | 2:03PM | 212 571 0392 | G3RFS | 0:33" | P. | 2 OK | | 3308 |
| | | Dec. 2. | 3:08PM | | G3RFS | 0:48" | P. | 1 OK | | 3308 |
| | | | 5:12PM | 19179708158 | G3RFS | 1:10" | P. | 2 OK | | 3308 |
| | | Dec. 3. | 9:50AM | | G3RFS | 0:28" | P. | 2 OK | | 3308 |
| | | | 11:54AM | | G3RFS | 0:22" | P. | 1 OK | | 3308 |
| | | Dec. 4. | 10:48AM | | G3RFS | 0:23" | P. | 2 OK | | 3308 |
| | | Dec. 5. | 2:57PM | 12125710392 | G3RFS | 0:50" | P. | 3 OK | | 3308 |
| | | Dec. 6. | 10:57PM | 12125710392 | G3RFS | 0:50" | P. | 3 OK | | 3308 |
| | | Dec. 9. | 10:39AM | | G3RFS | 0:35" | P. | 1 OK | | 3308 |
| | | | 1:57PM | 212 571 0392 | G3RFS | 0:34" | P. | 3 OK | | 3308 |
| | | | 3:36PM | 212 571 0392 | G3RFS | 0:27" | P. | 2 OK | | 3308 |
| | | Dec. 10. | 12:30PM | | G3RFS | 0:59" | P. | 1 OK | | 3308 |
| | | | 3:45PM | 2122937224 | G3RFS | 0:27" | P. | 1 OK | | 3308 |
| | | Dec. 11. | 5:12PM | | G3RFS | 1:25" | P. | 2 OK | | 3308 |
| | | Dec. 12. | 9:58AM | | G3RFS | 0:28" | P. | 2 OK | | 3308 |
| | | | 11:55AM | | G3RFS | 7:41" | P. | 9 OK | | 3308 |
| | | Dec. 13. | 3:06AM | | G3RFS | 0:39" | P. | 1 OK | | 3308 |
| | | | 9:37AM | 212 571 0392 | G3RFS | 0:32" | P. | 2 OK | | 3308 |
| | | | 11:33AM | 718 625 6837 | G3RFS | 0:58" | P. | 1 OK | | 3308 |
| | | | 11:39AM | 718 625 6837 | G3RFS | 1:00" | P. | 1 OK | | 3308 |
| | | | 12:09PM | 9732394310 | G3RFS | 0:30" | P. | 2 OK | | 3308 |
| | | | 2:49PM | 212-951-1302 | G3RFS | 0:58" | P. | 2 OK | | 3308 |
| | | | 6:51PM | | G3RFS | 6:38" | P. | 9 OK | | 3308 |
| | | Dec. 16. | 1:38PM | 212-951-1302 | G3RFS | 0:55" | P. | 2 OK | | 3308 |
| | | | 4:19PM | | G3RFS | 0:41" | P. | 1 OK | | 3308 |
| | | Dec. 17. | 1:03PM | | G3RFS | 0:35" | P. | 1 OK | | 3308 |
| | | | 1:24PM | 7186364445 | G3RFS | 0:15" | P. | 1 OK | | 3308 |
| | | Dec. 18. | 3:55PM | 12124814853 | G3RFS | 0:17" | P. | 1 OK | | 3308 |
| | | | 4:25PM | | G3RFS | 2:08" | P. | 5 OK | | 3308 |

TX Count 000468

RX Count 001401

: Batch
M : Memory
S : Standard
Y : Reduction
Q : RX Notice
A : IP-FAX

Req.

C : Confidential
L : Send later
D : Detail
H : Stored/D. Server
A : RX Notice
F : Folder

\$: Transfer
@ : Forwarding
F : Fine
* : LAN-Fax
N : NGN

P : SEP Code
E : ECM
U : Super Fine
+ : Delivery
M : Mail

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E-mail: gnd401@aol.com

Web Site: <http://www.goldbergerdubin.com>

Fax

transmittal**To:**

Magistrate

Fax:

212 805 4060

From:

Edgar L. Fankbonner, Esq.

Date:

12/19/2019

Re:USA v. Bethune
Case No. 19-mj-10427**Page:**

2, including cover sheet.

☒ BY FAX ONLY☐ HARD COPY BY MAIL☐ PLEASE REPLY☐ CONFIDENTIAL☒ As requested☐ Please phone to discuss☐ For your information☐ Please sign & return☐ For your consideration & approval☒ Kindly acknowledge receipt☐ Please review & advise

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UNITED STATES DISTRICT COURT

for the

Southern District of New York

The United States of America*Plaintiff*

v.

Dareece Bethune*Defendant*

Case No. 19-mj-10427

APPEARANCE OF COUNSEL

To: The clerk of court and all parties of record

I am admitted or otherwise authorized to practice in this court, and I appear in this case as counsel for:

Dareece BethuneDate: 12/11/2019/s/ Edgar L. Fankbonner*Attorney's signature*Edgar L. Fankbonner, SDNY No. EF2713*Printed name and bar number*Goldberger & Dubin, PC
401 Broadway, Suite 306
New York, New York 10013*Address*fankbonner@gmail.com*E-mail address*(212) 431-9380*Telephone number*(212) 966-0588*FAX number*

Marcos Quintero

From: Ravi, Sagar (USANYS) <Sagar.Ravi@usdoj.gov>
Sent: Thursday, December 19, 2019 12:20 PM
To: Marcos Quintero
Cc: jchabrowe@gmail.com
Subject: RE: 19 Mag. 10177 - Charles Ifeanyi Ogozy

Marcos I'm sorry for the confusion – I meant to say below that we do NOT oppose the request for travel, as was indicated in the defendant's letter.

From: Ravi, Sagar (USANYS)
Sent: Thursday, December 19, 2019 12:06 PM
To: Marcos Quintero <Marcos_Quintero@nysd.uscourts.gov>
Cc: jchabrowe@gmail.com
Subject: RE: 19 Mag. 10177 - Charles Ifeanyi Ogozy

I can be available then. Can you or Mr. Chabrowe please provide me with a copy of the defendant's request, which was not sent to the Government?

From: Marcos Quintero <Marcos_Quintero@nysd.uscourts.gov>
Sent: Thursday, December 19, 2019 12:02 PM
To: Ravi, Sagar (USANYS) <SRavi@usa.doj.gov>
Cc: jchabrowe@gmail.com
Subject: RE: 19 Mag. 10177 - Charles Ifeanyi Ogozy

Good Afternoon,

Judge Fox has informed me that we should schedule a bail hearing regarding Mr. Chabrowe's request to modify his bail to allow him to travel. Tomorrow at 11:30 AM is available.

Thank you
Marcos

From: Ravi, Sagar (USANYS) <Sagar.Ravi@usdoj.gov>
Sent: Thursday, December 19, 2019 11:22 AM
To: Marcos Quintero <Marcos_Quintero@nysd.uscourts.gov>
Subject: Re: 19 Mag. 10177 - Charles Ifeanyi Ogozy

We do oppose the travel for the holidays.

Sent from my iPhone

On Dec 19, 2019, at 11:21 AM, Marcos Quintero <Marcos_Quintero@nysd.uscourts.gov> wrote:

Sagar,

Mr Chabrowe has submitted a letter requesting permission to travel for Mr Ogozy. Judge Fox wants to confirm the government does not oppose.